

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION )  
\_\_\_\_\_  
) MDL No. 2419  
THIS DOCUMENT RELATES TO: ) Dkt. No 1:13-md-2419 (FDS)  
All Actions )  
\_\_\_\_\_  
)

**AFFIDAVIT OF DONALD JONES, MD**

STATE OF TENNESSEE  
COUNTY OF DAVIDSON

Comes Donald Jones, MD, after first being duly sworn, and states as follows:

1. I am over 18 years of age, have personal knowledge of the facts contained herein, and am competent to testify to same.
2. I am a former employee of PCA Pain Care Center, Oak Ridge ("PCA"). I am also a licensed physician.
3. Effective November 1, 2012, my employment with PCA was terminated due to a change in PCA's ownership.
4. I purchased the facility from PCA and sold it to Comprehensive Pain Specialists ("CPS"). I am currently employed by CPS.
5. I no longer have access to PCA's medication purchase records, corporate ownership records, or general business records.
6. PCA began purchasing methylprednisolone acetate from NECC in July 2012.
7. PCA began purchasing Isovue contrast dye from NECC in June 2011. I am unaware of any illnesses associated with Isovue from NECC.



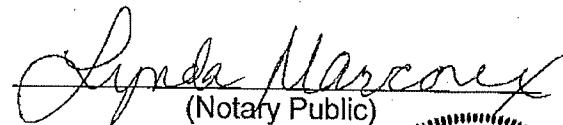
8. In order to determine which patients received NECC Isovue, I would have to consult my fluoroscopy log, which documents the use of fluoroscopy and contrast dye by date and patient name, from June 2011 to the end of September 2012. For that time period, there are between 3,000 and 4,000 patients on the fluoroscopy log. Next, I would have to consult each of those patients' medical records to confirm the use of Isovue and obtain the demographic information requested including, date of birth, social security number, address, and phone number. When PCA changed ownership, all medical records were archived electronically in a system that is difficult to navigate. As a result, searching for patient information in the system is slow. I estimate that I could confirm the use of Isovue and obtain the demographic information for only a few patients per hour using the archived data system.

9. I will have to hire another employee to perform the task. It would take months to compile such a list, maybe as many as six months given the tediousness of the process. I estimate that I would have to pay the new staff member between \$20,000 and \$30,000 to compile the list, but that is just a rough estimate.



(Signature of Affiant)

Sworn to and subscribed by me on this 10 day of July, 2013.



Lynda Marcoux  
(Notary Public)

My Commission Expires: 11/29/15

